

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

ESTATE OF CHRISTOPHER J. DAVIS and  
DORETHA LOCK, as the Special Administrator of  
the Estate of Christopher J. Davis,

Case No.: 18-CV-01846

Plaintiffs,

v.

JUAN ORTIZ, WALWORTH COUNTY, a municipal  
corporation, KURT PICKNELL,  
TOWN OF EAST TROY, a municipal corporation,  
VILLAGE OF EAST TROY, a municipal corporation,  
JAMES R. SURGES, ALAN BOYES,  
JEREMY SWENDROWSKI, MATTHEW WEBER,  
PAUL SCHMIDT, CRAIG KNOX, JEFF PRICE,  
AARON HACKETT, JOSE G. LARA,  
ROBERTO JUAREZ NIEVES, Jr.,  
ABC INSURANCE COMPANY,  
DEF INSURANCE COMPANY and  
XYZ INSURANCE COMPANY,

Defendants.

---

**MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST DEFENDANT ROBERTO JUAREZ NIEVES, JR.**

---

Plaintiffs, by their attorneys, requests that entry of judgment by default be entered  
against Defendant Roberto Juarez Nieves, Jr. pursuant to Federal Rule of Civil Procedure  
55(b). In support of this request, Plaintiffs relies upon the record in this case and the  
Declaration of Nathaniel Cade, Jr.

Dated this 5<sup>th</sup> day of January, 2019.

CADE LAW GROUP LLC

By: s/Nathaniel Cade, Jr.  
Nathaniel Cade, Jr.  
P.O. Box 170887



Milwaukee, WI 53217  
(414) 255-3802 (phone)  
(414) 255-3804 (fax)  
[nate@cade-law.com](mailto:nate@cade-law.com)  
Attorneys for Plaintiffs